

JACKSON LEWIS LLP  
220 Headquarters Plaza  
East Tower, 7th Floor  
Morristown, NJ 07960  
(973) 538-6890  
ATTORNEYS FOR DEFENDANT PFIZER INC.

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

PATIENT CARE ASSOCIATES LLC :  
a/s/o L.H., :

Plaintiff, :

vs. :

PFIZER; ABC CORP. (1-10) (Said  
names being fictitious and unknown  
entities), :

Defendant(s). :

Civil Action No. 2:13-cv-2065 (CCC)(JAD)

**NOTICE OF MOTION TO DISMISS THE  
SECOND AND THIRD COUNTS OF  
PLAINTIFF'S COMPLAINT**

TO: Andrew R. Bronsnick, Esq.  
Massood & Bronsnick, LLC  
50 Packanack Lake Road East  
Wayne, NJ 07470

**PLEASE TAKE NOTICE** that on Monday, June 17, 2013, or as soon thereafter as counsel may be heard, Defendant Pfizer Inc. ("Defendant"), by and through its counsel, Jackson Lewis LLP, will move before this Court, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, for an Order dismissing the Second and Third Counts of the Complaint of Plaintiff Patient Care Associates LLC a/s/o L.H., as a matter of law.

**PLEASE TAKE FURTHER NOTICE** that in support of said motion, Defendant will rely upon the attached Memorandum of Law and supporting Declaration of Carla D. Macaluso.

Respectfully submitted,

JACKSON LEWIS LLP  
220 Headquarters Plaza  
East Tower, 7th Floor  
Morristown, New Jersey 07960-6834  
(973) 538-6890

By: s/ Carla D. Macaluso  
Carla D. Macaluso  
Janet O. Lee  
ATTORNEYS FOR DEFENDANT  
PFIZER INC.

Dated: May 23, 2013